

1 Jefferson T. Collins, Bar #016428  
2 JONES, SKELTON & HOCHULI, P.L.C.  
3 40 North Central Avenue, Suite 2700  
4 Phoenix, Arizona 85004  
5 Telephone: (602) 263-1700  
6 Fax: (602) 200-7825  
7 jcollins@jshfirm.com

8 Attorneys for Defendant Target Stores, Inc.

9  
10 **UNITED STATES DISTRICT COURT**  
11  
12 **DISTRICT OF ARIZONA**

13 Robert Griffith, a single man,

14 Plaintiff,

15 NO.

16 **NOTICE OF REMOVAL**

17 v.

18 Target Stores, Inc., a Minnesota corporation,

19 Defendant.

20  
21  
22  
23  
24  
25  
26  
27  
28 Defendant Target Stores, Inc., by and through undersigned counsel, files this  
Notice of Removal of this action to the United States District Court for the District of  
Arizona and states as follows:

1. On or about September 4, 2019, this action was commenced against  
Defendants in the Superior Court of the State of Arizona, in and for the County of  
Maricopa under the caption *Robert Griffith v. Target Stores, Inc., et al.* Copies of the  
initial pleadings are attached hereto as Exhibit A. Defendant was served by process on  
November 27, 2019.

2. Target Stores, Inc. is a Minnesota Corporation with its principal place  
of business in Minneapolis, Minnesota. According to the Complaint, Plaintiffs are  
residents and citizens of Maricopa County, Arizona.

3. This Court has original jurisdiction over the civil action pursuant to  
28 U.S.C. § 1332 in that the matter in controversy exceeds the sum or value of \$75,000  
exclusive of interest and costs, and the action is between citizens of different states.

1 While Plaintiff's Complaint does not specify precise damages claimed, Plaintiff has  
2 undergone a second surgery procedure which was disclosed on January 23, 2020, and,  
3 since that date, Plaintiff's counsel disclosed that the current medical specials are  
4 approximately \$30,000 and the amount in controversy exceeds \$75,000. Based upon this  
5 information, the amount in controversy exceeds the jurisdictional limits for diversity  
6 jurisdiction. Therefore, this action may be removed to this Court pursuant to the  
7 provisions of 28 U.S.C. § 1441, et seq.

8 4. Written notice of the filing of this Notice of Removal will be given to  
9 all adverse parties as required by law and a true and correct copy of this Notice will be  
10 filed with the Clerk of the Superior Court of the State of Arizona, in and for the County of  
11 Maricopa.

12 5. A Notice of Filing Notice of Removal was filed with the Superior  
13 Court and a copy of the same is attached as Exhibit B.

14 WHEREFORE, Defendant Target Stores, Inc. respectfully requests that this  
15 action be removed to this Court.

16 DATED this 28th day of January 2020.

17 JONES, SKELTON & HOCHULI, P.L.C.  
18

19 By /s/ Jefferson T. Collins  
20 Jefferson T. Collins  
21 40 North Central Avenue, Suite 2700  
Phoenix, Arizona 85004  
22 Attorneys for Defendant Target Stores, Inc.  
23  
24  
25  
26  
27  
28

## **CERTIFICATE OF SERVICE**

I hereby certify that on this 28th day of January 2020, I caused the foregoing document to be filed electronically with the Clerk of Court through the CM/ECF System for filing; and served on counsel of record via the Court's CM/ECF system.

/s/ Kathy Kleinschmidt